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5 *Attorneys for Creditor*  
6 *D.A. Wood Construction, Inc.*

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8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 In re:  
12 PG&E CORPORATION,  
13 -and-  
14 PACIFIC GAS AND ELECTRIC COMPANY,  
15 Debtors.

- 16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric Company  
18 ☒ Affects both Debts

19 *\*All papers shall be filed in the Lead Case, No.  
19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)  
**CREDITOR D.A. WOOD  
CONSTRUCTION INC.'S RESPONSE  
TO REORGANIZED DEBTOR'S  
FORTY-FOURTH OMNIBUS  
OBJECTION TO CLAIMS**

20 COMES NOW, D.A. Wood Construction Inc. ("D.A. Wood"), and files this response  
21 ("Response") to the Debtors' Forty-Fourth Omnibus Objection to Claims:

- 22 1. The Claim subject to this Response is Claim No. 8627 (the "Claim") in the amount of  
23 \$27,009.30 (the "Claim Amount").  
24 2. The Claim Amount was for costs and expenses incurred by D.A. Wood after a gas line  
25 owned/operated by Pacific Gas and Electric Company ("PG&E") was broken in the course of  
26 construction work. (See Declaration of Josh Malcom In Support of Creditor D.A. Wood  
27 Construction Inc.'s Response to Reorganized Debtor's Forty-Fourth Omnibus Objection to Claims  
28 ["Malcom Decl."] ¶ 3 [filed concurrently herewith].)

1        3.        D.A. Wood contends the Claim Amount was incurred due to PG&E's negligence in  
2 marking its gas lines in and surrounding a construction site. (Malcom Decl. ¶ 4.) The Claim  
3 Amount was incurred by D.A. Wood for, among other things, immediate action to safeguard and  
4 protect the public from PG&E's leaking gas line. (Id.) D.A. Wood is informed that PG&E alleges  
5 its agents/employees did mark the gas line at issue, but records submitted by D.A. Wood in  
6 support of its Claim refute PG&E's allegation that it is not liable to D.A. Wood for the Claim and  
7 Claim Amount. Based on these factual contentions that are currently in dispute, the Court should  
8 deny the Omnibus Objection as to the Claim.

9        4.        Reorganized Debtors' may serve a Reply to this Response to D.A. Wood's attorneys'  
10 of record appearing on the caption page to this Response.

11        5.        The individual with authority to reconcile, settle, or otherwise resolve the Omnibus  
12 Objection on behalf of D.A. Wood is Josh Malcom, 963 Shepard Ct. Oakdale, CA 95361, (209)  
13 491 4970, jmalcom@dawoodinc.com.

14 DATED: December 1, 2020

DAMRELL, NELSON, SCHRIMP,  
PALLIOS & SILVA

16 By: /S/ Blaine R. Cox  
17 Blaine R. Cox,  
18 Attorneys for D.A. Wood  
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